

## *REMARKS*

Applicants thank the Examiner for the very thorough consideration given the present application.

Claims 1-3 and 5-12 are now present in this application. Claims 1 and 6 are independent.

Amendments have been made to the specification, and claims 1 and 6 have been amended. Reconsideration of this application, as amended, is respectfully requested.

### *I. Priority Under 35 U.S.C. § 119*

Applicants thank the Examiner for acknowledging Applicants' claim for foreign priority under 35 U.S.C. § 119 in the Office Action dated May 22, 2002, and receipt of the certified priority document.

### *II. Information Disclosure Citation*

Applicants thank the Examiner for considering the references supplied with the Information Disclosure Statement filed July 5, 2002, and for providing Applicants with an initialed copy of the PTO-1449 form filed therewith with the Office Action dated October 24, 2002. Therefore, no outstanding issues remain with respect to the consideration of Information Disclosure Statements.

### *III. Drawings*

One sheet of corrected formal drawings were filed by way of a Letter to the Official Draftsperson on February 24, 2003. Applicants have not received a Notice of Draftsperson's Patent Drawing Review PTO-948 indicating whether or not the formal drawings have been approved by the Draftsperson. Since no objection has been received, Applicants assume that the drawings are acceptable and that no further action is necessary. Confirmation thereof in the next Office Action is respectfully requested.

### *IV. Specification Amendments*

Applicants have amended the specification in order to correct a minor typographical error.

### *V. Rejections under 35 U.S.C. § 103*

Claims 1-3 and 6 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the alleged Admitted Prior Art in view of Sugawara et al. Further, claims 5 and 7-12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the alleged Admitted Prior Art and Sugawara et al., further in view of Lu et al. These rejections are respectfully traversed.

Complete discussions of the Examiner's rejections are set forth in the Office Action, and are not being repeated here.

At the outset, no admission has been made by Applicants that Figure 1 of

the present application qualifies as statutory prior art usable in a rejection of the claims of the present application. Instead, Applicants have labeled Figure 1 as "Conventional Art" to distinguish Applicants' invention from that which is not Applicants' invention. If a drawing figure illustrates only material which is known to be statutory prior art to the invention, then the use of the phrase --Prior Art-- in the drawing figure would be proper. However, if it is not clear whether such material is statutory prior art, then the use of the phrase --Prior Art-- in the drawing figures would not be proper, and a label such as "Conventional Art" would be more appropriate to distinguish Applicants' invention from that which is not Applicants' invention. Simply labeling a drawing Figure as "Conventional Art" does not automatically render the illustration therein prior art usable in a rejection. Accordingly, Applicants respectfully submit that the Examiner has not set forth a *prima facie* case of obviousness, and for at least this reason, Applicants respectfully request that the rejections be reconsidered and withdrawn.

In addition, while not conceding the appropriateness of the Examiner's rejection, but merely to advance prosecution of the instant application, Applicants respectfully submit that independent claims 1 and 6 have been amended to recite a combinations of elements in a one system module including a module body having a first groove and a second groove, the second groove comprising a generally C-shaped recess having a bottom wall, a top wall parallel to the bottom wall, and a side wall interconnecting the top wall and the bottom wall, and an epoxy PCB supported in said second groove by the bottom

wall, the side wall, and the top wall. Applicants respectfully submit that the combinations of elements as set forth in independent claims 1 and 6 are not disclosed or made obvious by the prior art of record, including the alleged Admitted Prior Art, Sugawara et al. and Lu et al.

The Examiner states that Figure 1 (the alleged Admitted Prior Art) of the present application shows a module body with a PCB supported in a first groove, but does not show a second groove in the module body for supporting the second PCB. The Examiner relies on Sugawara et al for a showing of a second groove in a module body for supporting a second PCB, and that it would be obvious to have included a second groove in the module body of Figure 1 in view of the teachings of Sugawara et al.

Applicants respectfully submit that Sugawara et al teach the utilization of an L-shaped groove (stepped portion 12) having only a bottom wall and a side wall. Therefore, the groove of Sugawara et al does not have a top wall parallel to the bottom wall, as claimed.

In addition, the L-shaped groove of Sugawara et al. permits the PCB to be lowered into the module housing, and does not itself restrict vertical movement of the PCB. Instead, the PCB of Sugawara et al. must be secured in the L-shaped groove "by the use of an adhesive or the like". (Col. 4, line 61). Therefore, the L-shaped groove of Sugawara et al does not support the PCB in the second groove by the top wall, as claimed. In contrast to Sugawara et al., the C-shaped groove of the present invention provides sufficient fixation of the PCB without the necessity of adhesives, since the PCB is restrained by the

bottom wall, the side wall, and the top wall of the second groove.

Applicants use of a second groove comprising a C-shaped recess having a bottom wall, a top wall parallel to the bottom wall, and a side wall interconnecting the top wall and the bottom wall provides an advance over the applied prior art as discussed above, and therefore defines patentable allowable subject matter.

Applicants respectfully submit that the combinations of elements as set forth in independent claims 1 and 6 are not disclosed or made obvious by the prior art of record, including the alleged Admitted Prior Art, Sugawara et al. and Lu et al., for the reasons explained above. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

With regard to dependent claims 2, 3, 5 and 7-12, Applicants submit that claims 2, 3 and 5 depend from independent claim 1, and claims 7-17 depend, either directly or indirectly, from independent claim 6, which are allowable for the reasons set forth above, and therefore claims 2, 3, 5 and 7-12, are allowable based on their dependence from claims 1 or 6. Reconsideration and allowance thereof are respectfully requested.

## *VI. Conclusion*

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be

withdrawn. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone James T. Eller, Jr., Registration No. 39,538, at (703) 205-8000, in the Washington, D.C. area.

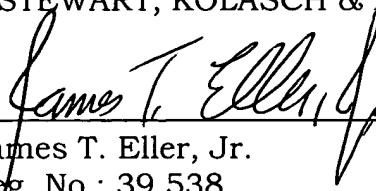
Prompt and favorable consideration of this Amendment is respectfully requested.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

BIRCH, STEWART, KOLASCH & BIRCH, LLP

By: \_\_\_\_\_

  
James T. Eller, Jr.  
Reg. No.: 39,538

JTE:mmi:sld

P.O. Box 747  
Falls Church, Virginia 22040-0747  
Telephone: (703)205-8000